

1 PHILLIP A. TALBERT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700  
5 Attorneys for the United States

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$214,842.60 SEIZED  
FROM JP MORGAN CHASE BANK  
15 ACCOUNT NUMBER 623081319, AND

16 2021 CHEVROLET SILVERADO 1500  
CUSTOM TRUCK, VIN:  
17 1GCRWBEK4MZ163537, LICENSE  
NUMBER 26288D3,  
18

19 Defendants.

2:22-MC-00130-MCE-DB

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Devlin  
21 Hosner (“claimant”), by and through their respective counsel, as follows:

22 1. On or about January 12, 2022, claimant filed a claim in the administrative forfeiture  
23 proceeding with the Internal Revenue Service-Criminal Investigation (“IRS-CI”) with respect to the  
24 above-referenced defendant assets (hereafter collectively “defendant assets”), which were seized on  
25 October 23, 2021 and November 8, 2021.

26 2. The IRS-CI has sent the written notice of intent to forfeit required by 18 U.S.C. §  
27 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
28 defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim

1 to the defendant assets as required by law in the administrative forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
3 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are  
4 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
5 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
6 That deadline is April 12, 2022.

7 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to June  
8 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States shall be  
11 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
12 alleging that the defendant assets are subject to forfeiture shall be extended to June 10, 2022.

13  
14 Dated: 4/8/2022

PHILLIP A. TALBERT  
United States Attorney


15  
16 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

17  
18 Dated: 4/11/2022

/s/ David Greenberg  
David Greenberg  
Attorney for potential claimant  
Devlin Hosner  
74361 Highway 111, Suite 10  
Palm Desert, CA 92260  
(Signature retained by attorney)

19  
20  
21  
22 IT IS SO ORDERED.

23 Dated: April 15, 2022

24  
25   
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE